

WELCOME TO DOE'S *RCRA ORIENTATION FOR FACILITY MANAGERS* COURSEWARE

- Background** This module comprises one component of courseware materials that were developed by DOE's Office of Environmental Policy and Assistance, RCRA/CERCLA Division, EH-413, in response to a request from the Deputy Assistant Secretary for Nuclear and Facility Safety (EH-3). The original course was titled *RCRA Orientation for Nuclear and Facility Safety* and was presented on March 5, 1997, at Germantown, MD. Presentation materials were derived from the more formal three-day course titled DOE's *RCRA Orientation Workshop*, which was developed by EH-413 under a joint funding venture that included the Savannah River Site and the Albuquerque Operations Office.
- Courseware Content** Although derived from the three-day workshop, DOE's *RCRA Orientation for Nuclear and Facility Safety* (now titled *RCRA Orientation for Facility Managers*) was expanded by developing two new modules to meet the needs of Nuclear Safety Managers. One of the new modules (*Corrective Action*) compares and contrasts RCRA closure and corrective action with CERCLA remedial action by using Oak Ridge Reservation as an example of a radioactively contaminated site closed under RCRA, but undergoing remediation under CERCLA. The other module (*Emerging Issues*) offered a snapshot of the emerging regulations that were expected to impact the Department most dramatically. The remaining courseware modules include:
- Introduction to RCRA and Liability Overview,
 - Overview of Solid Waste Determination,
 - Overview of Hazardous Waste Determination, and
 - Permitting.
- PDF "Handout" files only, which contain the aforementioned modules, are designed to serve as stand-alone resources and are equipped with: (1) A list of module contents, (2) Module-specific enabling objectives; (3) Self-assessment questions and answers; (4) A module-specific regulatory citation/key word index; and (5) A module-specific cross-link table that identifies hypertext links to additional Internet resources for hazardous waste-related information.
- Using the Courseware Materials** Within the PDF Handout modules, users are encouraged to examine the module's Regulatory-Statutory Citation/Key Word Index to identify the availability and location of topics of interest. In contrast, users can simply "dig-in" and sequentially examine the courseware's content. For less extensive reviews or to download additional course presentation materials as needed, users can return to the [*RCRA Orientation for Facility Managers Home Page*](#) to access electronic files containing the remaining PDF Handout and/or Vugraph files.

To assist users in accessing additional Internet resources, where possible, module-specific hypertext links have been inserted into select points within each of the six PDF Handout courseware modules. Hypertext links appear in both the slide and notes portions as either *blue italicized text* (the first time a link to a particular resource is offered in a given module) or *green italicized text* (each subsequent link to that same resource) and have been assigned to terms and phases for which additional Internet resources such as other EH-413 guidance documents, other Internet Websites, etc. are available. Upon identifying a highlighted term or phase of interest, users generally can access the additional Internet resources by clicking on the highlighted text, which will then hypertext link to another Internet resource. Additional information for obtaining those resources that are not Internet-accessible as well as the objectives, content and organization, use, list of acronyms, Internet resources, and master index is presented in the [*Front-End Materials section*](#) (first section).

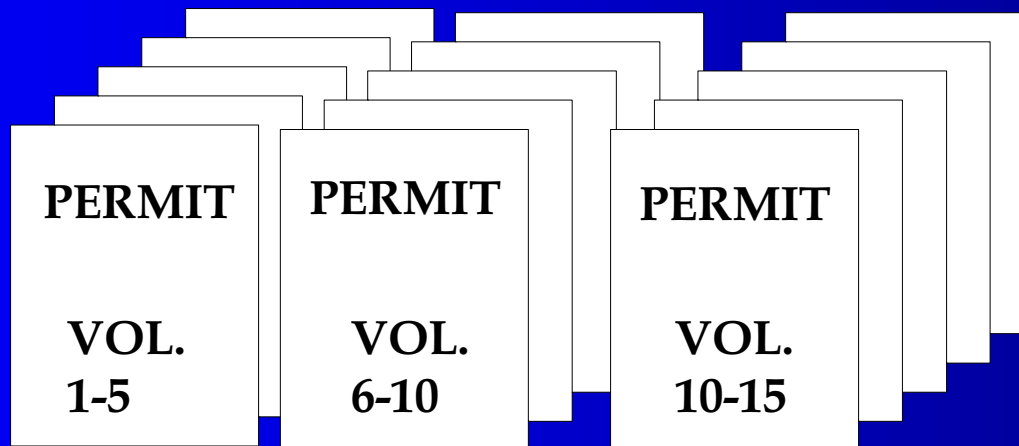
**Feedback
And
Contacts**

If you have difficulty in downloading or reviewing modules comprising DOE's *RCRA Orientation for Facility Managers*, [contact our Webmaster](#) and please [provide us with feedback](#). If you are interested in attending the three-day *RCRA Orientation Workshop*, please contact the [National Environmental Training Office](#). Additional questions concerning this courseware or the information presented therein may be directed to Atam Sikri of my staff by:

- Calling at (202) 586-1879,
- Faxing messages to (202) 586-0955, or
- Communicating electronically, via Internet, to atam.sikri@eh.doe.gov.



Permitting



RCRA Requires a Permit for TSD:

- **Treatment:** Changing physical, chemical, or biological character or composition.
- **Storage:** Holding waste temporarily before treatment, disposal, or storage elsewhere.
- **Disposal:** Discharging, depositing, injecting, dumping, spilling, leaking, or placing any solid or hazardous waste into or on land or water.

Exclusion from Permitting

- A facility subject to the special exemptions for *recyclable materials* in 40 CFR Part 266
- *Generators* storing waste on-site in compliance with accumulation requirements
- Owners or operators of “totally enclosed treatment facilities,” “wastewater treatment units,” and “elementary neutralization units”;
- Persons engaged in containment for an immediate response to an emergency
- Transporters storing *manifested* wastes at a transfer facility for less than 10 days

RCRA Provides Two Permitting Approaches:

- Facilities in existence on the effective date of a rule may operate under *interim status*
- New facilities, and eventually interim status facilities, must apply for *a Part B permit* (i.e., a full RCRA permit)

What Must I Do for Interim Status?

- Use regulations in 40 CFR 265 to understand requirements that must be met to be allowed to conduct hazardous waste activities.
- Follow provisions in 40 CFR 270 Subpart G
- Use regulations in 40 CFR 270 to understand the permitting process.

Interim-Status Facilities Must Submit a *Part A Application* in Accordance with 40 CFR 270.13 That Includes:

- Activities conducted that require permit
- Facility name, address, and location
- SIC codes that best reflect type of industry
- Operator's name, address, phone, ownership status, and status as Federal, State, private, public, or other entity
- Name, address, and telephone of facility owner
- Whether facility is on Indian land
- Whether the facility is new or existing and whether it is a first or revised application

Contents of *Part A Application* (cont'd)

- Scale drawing and photograph showing structures and TSD areas
- TSD processes to be used
- The hazardous wastes to be managed, their quantities, and processes used for them
- A listing of all permits or approvals under certain other laws
- A topographic map depicting facility intakes, discharges, and wells
- Brief description of nature of business

40 CFR 265 Requirements Include *General Standards* for All TSDFs

- Identification number
- *Waste analysis plan*
- Security
- General *inspection* requirements (specific requirements for particular units also apply)
- *Preparedness and prevention*
- *Contingency planning*
- *Manifests*

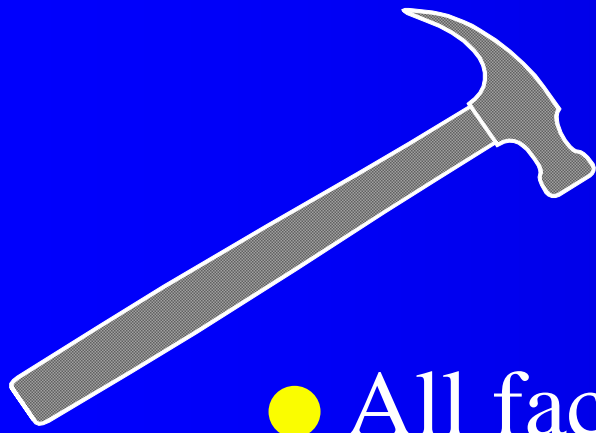
And Specific Design, Operating, and Closure Standards Developed for:

- *Containers* (40 CFR 265 Subpart I)
- *Tanks* (40 CFR 265 Subpart J)
- Surface impoundments (40 CFR 265 Subpart K)
- Waste piles (40 CFR 265 Subpart L)
- Land treatment units (40 CFR 265 Subpart L)
- Landfills (40 CFR 265 Subpart N)

Design, Operating, and Closure Standards Developed for: (cont'd)

- *Incinerators* (40 CFR 265 Subpart O)
- Thermal treatment (40 CFR 265 Subpart P)
- Chemical, physical, and biological treatment (40 CFR 265 Subpart Q)
- Underground injection wells (40 CFR 265 Subpart R)
- Drip pads (40 CFR 265 Subpart W)
- Air emission standards (40 CFR 265 Subparts *AA*, *BB*, and *CC*)
- Containment buildings (40 CFR 265 Subpart DD)

HSWA Set Deadlines for Permit Issuance



- All facilities in existence on November 8, 1984, had to apply for permits by November 8, 1988.
- Facilities that failed to apply, *lost interim status* on November 8, 1992.

What is Required for a *Part B Permit?*

- The information requirements of the Part B permit application (40 CFR 270.14 through 270.27) are tied to TSDf performance standards in 40 CFR 264.
- To obtain a permit, facilities must prepare a permit application that addresses *general facility requirements* and design and operating standards established in 40 CFR 264.
- After a period of review and modification, EPA/State can issue a Part B permit.

Contents of Part B: General Requirements

- Description of facility and location
- Copy of operator training program
- *Closure plan* and cost estimate
- *Inspection schedule*
- *Chemical and physical analysis of wastes*
- Detailed topographic map
- Detailed groundwater protection information
- *Groundwater monitoring* information

Closure Plan

- Performance standards for closure include
 - minimize need for further maintenance
 - control, minimize, or eliminate contaminant escape
 - comply with specific standards for each facility type
- Closure must comply with a detailed closure plan and schedule approved by EPA or State
- Equipment, structures, and soils must be disposed of or decontaminated OR
- Post-closure monitoring and maintenance must be performed for at least 30 years

Contents of Part B: Specific Requirements

- Containers (40 CFR 264 Subpart I)
- Tank systems (40 CFR 264 Subpart J)
- Surface impoundments (40 CFR 264 Subpart K)
- Waste piles (40 CFR 264 Subpart L)
- Land treatment facilities (40 CFR 264 Subpart M)
- Landfills (40 CFR 264 Subpart N)

Contents of Part B: Specific Requirements (cont'd.)

- Incinerators (40 CFR 264 *Subpart O*)
- Process vents (40 CFR 264 *Subpart AA*)
- Equipment (40 CFR 264 *Subpart BB*)
- Air emission controls for tanks, surface impoundments, and containers (40 CFR 264 *Subpart CC*)
- Containment Buildings (40 CFR 264 Subpart DD)

Subpart X: Miscellaneous Units

- Covers technologies not covered by other standards such as
 - geologic repositories
 - open detonation unit
- Allows permitting based on specific design, operating, and monitoring requirements to be determined case-by-case

Subpart X: Miscellaneous Units

- Requires analysis to prove that the design/operating parameters prevent releases that could have adverse affect
- Must consider
 - waste volume and characteristics
 - hydrogeologic setting
 - groundwater flow
 - groundwater and land use
 - potential migration of released waste constituents through all pathways

Other *Types of Permits*

- Permits-by-rule
- Emergency permits
- Hazardous waste incinerator permits
- Land treatment demonstration permits
- Permits for boilers and industrial furnaces burning hazardous waste
- Interim permits for UIC wells
- Research, development and demonstration permits
- *Post-closure permits*

The *Permit Process*

- Preparing the application
- Conducting a pre-application meeting
- Submitting a permit application
- Reviewing the permit application
- Preparing the draft permit
- Taking public comment
- Finalizing the permit

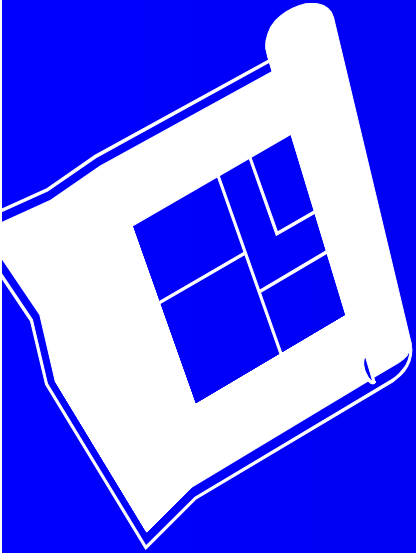
Public Involvement

- The public must be notified at least 30 days prior to pre-application meetings.
- Regulators notify the public of the application.
- The public must be notified (by the regulators) and allowed at least 45 days to comment on a draft permit/application denial.
- The public must be notified (by the regulators) at least 30 days before a public hearing.

Public Involvement (cont'd)

- Any interested person may submit written comments.
- A written request stating the issues to be raised at the hearing must be submitted for a public hearing.
- Public comment may be reopened to expedite the decision-making process.
- The public must be notified of final permit decisions.
- Permits are effective 30 days after notification of the decision to grant the permit.

Permit Modifications (OR Nothing Stays the Same) (40 CFR 270.41)



- Alterations of facility or activity
- Availability of new information that would have justified the application of different permit conditions
- New requirements
- Good cause (i.e., act of God, strike, etc.) to modify compliance schedules

Classes of Modifications: Examples

- CLASS 1
 - Administrative and informational changes
 - Equipment replacement or upgrade
- CLASS 2
 - Changes in number, location, depth, or design of wells
 - Extension of the post-closure care period
- CLASS 3
 - Reduction in post-closure care period

What Else Does the Permit Require?

Corrective Action

- Corrective action requirements are imposed through the permit or, for interim status facilities, an enforcement order
- Permits must contain schedules of compliance to address releases
- Corrective action efforts around the country may encompass thousands of TSDFs

Permitting in Summary

- RCRA provides two avenues for operation: interim status and final (part B) permitting.
- The permit establishes the conditions of operation for TSDFs.
- Permit requirements in 40 CFR Part 270 are tied to facility standards in 40 CFR Part 264.
- Permitting goes through a seven-stage process that affects regulator, permittee, and public.
- RCRA contains provisions for permit modifications.
- Permittees must consider corrective action.

Permitting Module Cross-Links

Module Page/Line	Cross-Link Language	Resource/Document
P-3/Slide, Line 1	"Exclusion from Permitting"	Types of RCRA Permits, DOE/EH-413/9715; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/permits.pdf
P-3/Slide, Line 3	"recyclable materials"	Requirements for the Recycling of Hazardous Waste; DOE/EH-231-001/0990; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/recycle.pdf
P-3/Slide, Line 4	"Generators"	Hazardous Waste Generator Requirements, DOE/EH-231-055/1194 (Revised August 1997); http://tis-nt.eh.doe.gov/oepa/guidance/rcra/gener_rv.pdf
P-3/Slide, Line 11	"manifested"	Manifest Requirements, DOE/EH-231-038/0394 (revised); http://tis-nt.eh.doe.gov/oepa/guidance/rcra/manif_rv.pdf
P-3/Notes, Line 1	"exclusions"	Exclusions and Exemptions from RCRA Hazardous Waste Regulation; DOE/EH-231-034/0593; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/exclude.pdf
P-3/Notes, Line 6	"recycling"	Requirements for the Recycling of Hazardous Waste; DOE/EH-231-001/0990; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/recycle.pdf
P-3/Notes, Line 11	"generators"	Hazardous Waste Generator Requirements, DOE/EH-231-055/1194 (Revised August 1997); http://tis-nt.eh.doe.gov/oepa/guidance/rcra/gener_rv.pdf
P-4/Slide, Line 4	"interim status"	Loss of Interim Status (LOIS) under RCRA, DOE/EH-231-0181/0992; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/lois.pdf
P-4/Slide, Line 6	"Part B permit"	RCRA Permitting Guide for Hazardous and Radioactive Mixed Waste Management Facilities, DOE/EH(RCRA)9705; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/permit_a.pdf
P-4/Notes, Line 16	"lose interim status"	Loss of Interim Status (LOIS) under RCRA, DOE/EH-231-0181/0992; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/lois.pdf
P-4/Notes, Line 17	"permit"	RCRA Permitting Guide for Hazardous and Radioactive Mixed Waste Management Facilities, DOE/EH(RCRA)9705; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/permit_a.pdf

P-5/Slide, Line 1	“What Must I Do for Interim Status”	RCRA Permitting Guide for Hazardous and Radioactive Mixed Waste Management Facilities, DOE/EH(RCRA)9705; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/permit_ch1.PDF
P-5/Notes, Line 9	“permitting process”	RCRA Permitting Guide for Hazardous and Radioactive Mixed Waste Management Facilities, DOE/EH(RCRA)9705; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/permit_ch2.PDF
P-6/Slide, Lines 1-2	"Part A Application"	RCRA Permitting Guide for Hazardous and Radioactive Mixed Waste Management Facilities, DOE/EH(RCRA)9705; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/permit_ch2.PDF
P-6/Notes, Line 1	"Part A applications"	RCRA Permitting Guide for Hazardous and Radioactive Mixed Waste Management Facilities, DOE/EH(RCRA)9705; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/permit_ch2.PDF
P-7/Slide, Line 1	"Part A Application"	RCRA Permitting Guide for Hazardous and Radioactive Mixed Waste Management Facilities, DOE/EH(RCRA)9705; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/permit_ch2.PDF
P-8/Slide, Line 2	"General Standards"	General Facility Standard Requirements, DOE/EH-231-043/1294 [NOT available on the OEPA Website]
P-8/Slide, Line 4	“Waste analysis plan”	Preparation of RCRA Waste Analysis Plans (Interim), DOE/EH-0306 [NOT available on the OEPA Website]
P-8/Slide, Line 6	“inspection”	Federal Environmental Inspections Handbook, DOE/EH-0220; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/inspect_all.pdf
P-8/Slide, Line 8	“Preparedness and prevention”	RCRA Contingency Plans and Emergency Procedures, DOE/EH-231-006/0991 http://tis-nt.eh.doe.gov/oepa/guidance/rcra/cplans.pdf
P-8/Slide, Line 9	“Contingency planning”	Preparation of RCRA Contingency Plans, DOE/EH-0274 [NOT available on the OEPA Website]
P-8/Slide, Line 10	“Manifests”	Manifest Requirements, DOE/EH-231-038/0394 (revised); http://tis-nt.eh.doe.gov/oepa/guidance/rcra/manif_rv.pdf
P-8/Notes, Line 5	"general facility requirements"	General Facility Standard requirements, DOE/EH-231-043/1294 [NOT available on the OEPA Website]

P-9/Slide, Line 3	“Containers”	Management of Hazardous Waste Containers & Container Storage Areas under RCRA, DOE/EH-0333; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/container/contain_all.pdf
P-9/Slide, Line 4	“Tanks”	Resource Conservation and Recovery Act Hazardous Waste Tank Systems, DOE/EH-413/9716; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/tanks/tanks_all.pdf
P-9/Notes, Line 4	"container storage requirements"	Management of Hazardous Waste Containers & Container Storage Areas under RCRA, DOE/EH-0333; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/container/contain_all.pdf
P-10/Slide, Line 3	“Incinerators”	Consolidated Departmental Response to Revised Standards for Hazardous Waste Combustors; Notice of Proposed Rulemaking (NPRM), 61 FR 17358, 11/7/96; http://tis-nt.eh.doe.gov/oepa/comments/rcra/cbs-rule.pdf
P-10/Slide, Line 10	"AA,”	RCRA Air Emission Standards for Hazardous Waste Treatment, Storage, and Disposal Facility (TSDF) Process Vents, DOE/EH-231-020/0193; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/vents.pdf
P-10/Slide, Line 11	“BB”	RCRA Air Emission Standards for Hazardous Waste Treatment, Storage, and Disposal Facility (TSDF) Equipment Leaks, DOE/EH-231-019/0193; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/equipmnt.pdf
P-10/Slide, Line 11	“CC”	Organic Air Emission Standards; Revised Final Rule Issued, RCRA Regulatory Bulletin; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/ccregbl2.pdf
P-10/Notes, Line 7	"air emission standards"	RCRA Subpart CC Organic Air Emission Standards Technical Amendment Questions and Answers; DOE/EH (RCRA)-9701; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/subpartcc.pdf
P-10/Notes, Line 7	“tanks”	RCRA Subpart CC Organic Air Emission Standards: Tanks, DOE/EH-413/9801; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/ccinfobrief.pdf
P-10/Notes, Line 8	“containers”	RCRA Subpart CC Organic Air Emission Standards: Containers, DOE/EH-413/9801; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/cccontainers.pdf
P-11/Notes, Line 1	“HSWA”	OEPA Environmental Law Summary: Resource Conservation and Recovery Act; http://tis-nt.eh.doe.gov/oepa/law_sum/RCRA.HTM
P-11/Slide, Lines 6-7	"lost interim status"	Loss of Interim Status (LOIS) under RCRA, DOE/EH-231-0181/0992; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/lois.pdf

P-12/Slide, Line 2	"Part B Permit"	RCRA Permitting Guide for Hazardous and Radioactive Mixed Waste Management Facilities, DOE/EH(RCRA)9705; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/permit_ch2.PDF
P-12/Slide, Lines 8-9	"general facility requirements"	General Facility Standard Requirements, DOE/EH-231-043/1294 [NOT available on the OEPA Website]
P-12/Notes, Lines 1-2	"Part B permit application"	RCRA Permitting Guide for Hazardous and Radioactive Mixed Waste Management Facilities, DOE/EH(RCRA)9705; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/permit_ch2.PDF
P-12/Notes, Line 6	"general facility requirements"	General Facility Standard Requirements, DOE/EH-231-043/1294 [NOT available on the OEPA Website]
P-13/Slide, Line 1	"Content of Part B"	RCRA Permitting Guide for Hazardous and Radioactive Mixed Waste Management Facilities, DOE/EH(RCRA)9705; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/permit_ch2.PDF
P-13/Slide, Line 4	"Closure plan"	RCRA Closure and Post-Closure Plans, DOE/EH-231-009/1291; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/pcplans.pdf
P-13/Slide, Line 5	"Inspection schedule"	Federal Environmental Inspections Handbook, DOE/EH-0220; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/inspect_all.pdf
P-13/Slide, Line 6	"Chemical and physical analysis of wastes"	Preparation of RCRA Waste Analysis Plans (Interim), DOE/EH-0306 [NOT available on the OEPA Website]
P-13/Slide, Line 9	"Groundwater monitoring"	Ground-Water Monitoring Under RCRA, DOE/EH-231-039/1193; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/monitor.pdf
P-14/Slide, Line 1	"closure plan"	RCRA Closure and Post-Closure Plans, DOE/EH-231-009/1291; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/pcplans.pdf
P-14/Notes, Line 5- 6	"closure of the unit"	Closure of Hazardous and Mixed Waste Management Units at DOE Facilities, DOE/EGD(RCRA)-002/0690 [NOT available on the OEPA Website]
P-14/Notes, Line 6	"closure plan"	RCRA Closure and Post-Closure Plans, DOE/EH-231-009/1291; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/pcplans.pdf
P-14/Notes, Line 12	"clean closure"	RCRA Clean Closure Equivalency Demonstrations, DOE/EH-231-010/1291; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/equivdem.pdf
P-14/Notes, Line 18	"post-closure care permit"	RCRA Post-Closure Permits, DOE/EH-231-021/0593 [NOT available on the OEPA Website]

P-15/Notes, Line 3	"closure standards"	Closure of Hazardous and Mixed Waste Management Units at DOE Facilities, DOE/EGD(RCRA)-002/0690 [NOT available on the OEPA Website]
P-15/Notes, Line 10	"incompatible wastes"	Ignitable, Corrosive, Reactive, and Incompatible Wastes; DOE/EH-231-054/1294; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/ignit.pdf
P-15/Notes, Line 12	"ignitable or reactive wastes"	Ignitable, Corrosive, Reactive, and Incompatible Wastes; DOE/EH-231-054/1294; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/ignit.pdf
P-16/Slide, Line 3	"Subpart O"	Types of RCRA Permits, DOE/EH-413/9715; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/permits.pdf
P-16/Slide, Line 4	"Subpart AA"	RCRA Air Emission Standards for Hazardous Waste Treatment, Storage, and Disposal Facility (TSDF) Process Vents, DOE/EH-231-020/0193; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/vents.pdf
P-16/Slide, Line 5	"Subpart BB"	RCRA Air Emission Standards for Hazardous Waste Treatment, Storage, and Disposal Facility (TSDF) Equipment Leaks, DOE/EH-231-019/0193; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/equipmnt.pdf
P-16/Slide, Line 8	"Subpart CC"	Organic Air Emission Standards; Revised Final Rule Issued, RCRA Regulatory Bulletin; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/ccregbl2.pdf
P-16/Notes, Line 5	"Recent amendments"	RCRA Subpart CC Organic Air Emission Standards Technical Amendment Questions and Answers; DOE/EH (RCRA)-9701; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/subpartcc.pdf
P-19/Slide, Line 1	"Types of Permits"	Types of RCRA Permits, DOE/EH-413/9715; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/permits.pdf
P-19/Slide, Line 10	"Post-closure permits"	RCRA Permitting Guide for Hazardous and Radioactive Mixed Waste Management Facilities, DOE/EH(RCRA)9705; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/permit_ch5.pdf
P-19/Notes, Line 25	"Post-closure permits"	RCRA Post-Closure Permits, DOE/EH-231-021/0593 [NOT available on OEPA Website]

P-20/Slide, Line 1	“permit process”	RCRA Permitting Guide for Hazardous and Radioactive Mixed Waste Management Facilities, DOE/EH(RCRA)9705; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/permit_a.pdf
P-20/Notes, Line 1	“permit process”	RCRA Permitting Guide for Hazardous and Radioactive Mixed Waste Management Facilities, DOE/EH(RCRA)9705; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/permit_a.pdf
P-20/Notes, Lines 2-3	“expanded public participation provisions”	RCRA Expanded Public Participation - Final Rule, RCRA Regulatory Bulletin, January 31, 1997; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/public_p.pdf
P-21/Slide, Line 1	“Public Involvement”	RCRA Expanded Public Participation - Final Rule, RCRA Regulatory Bulletin, January 31, 1997; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/public_p.pdf
P-22/Slide, Line 1	“Public Involvement”	RCRA Expanded Public Participation - Final Rule, RCRA Regulatory Bulletin, January 31, 1997; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/public_p.pdf
P-23/Slide, Line 1	“Permit Modifications”	RCRA Permitting Guide for Hazardous and Radioactive Mixed Waste Management Facilities, DOE/EH(RCRA)9705; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/permit_ch4.PDF
P-24/Slide, Line 1	“Classes of Modifications”	RCRA Permitting Guide for Hazardous and Radioactive Mixed Waste Management Facilities, DOE/EH(RCRA)9705; http://tis-nt.eh.doe.gov/oepa/guidance/rcra/permit_ch4.PDF
P-25/Slide, Line 2	“Corrective Action”	Corrective Action module, Page 1
P-25/Notes, Line 12	“next module”	Corrective Action module, Page 1